

Hunters Point Al Jazeera article & radiation Q&As Draft 6-4-2015

The first 5 questions came from the Al Jazeera reporter last month.

1. What types of environmental complaints have residents filed with concern to these sites?

For Hunters Point, USEPA has invited community input regarding priorities for technical assistance services through a public meeting, interviews, and mail and email to 2,500 residents and stakeholders. Community members identified these priority areas for technical assistance: transportation of excavated radioactive waste, air quality during development construction, resiliency of landfill cleanup to climate change and earthquakes, and exposure of future residents after base redevelopment. USEPA is working with other agencies to provide requested technical assistance on these topics through public meetings, fact sheets, and other outreach. USEPA also attends all the Navy and City public meetings regarding the Shipyard cleanup and redevelopment and reaches out proactively to interested community organizations. These are all excellent opportunities for productive dialogue to understand and address community concerns.

2. What are the possible health concerns at these sites?

At Hunters Point, comprehensive risks assessments have studied potential health effects through breathing, skin contact, drinking, and other pathways for exposure to contaminants of concern. Cleanup plans require many different methods to protect the public from all these pathways. For example, they protect the public from breathing and skin contact through cleanup methods such as digging out contaminated soil, storm drains, and other structures and moving them offsite and through encapsulating them through durable covers, such as asphalt or a two-foot thick soil layer. They also protect the public from contaminated water through banning use of groundwater for drinking or bathing and through treatments such as injecting iron or lactate to promote chemical breakdown of contaminants.

3. Does the EPA have a sense for when the last parcel located at these sites will be deleted from the EPA's Superfund registry?

USEPA's goal is to delist Superfund sites or portions of sites from the National Priority List (NPL) when cleanup is complete. At Hunters Point, the Navy has made a great deal of progress on cleanup. Ongoing monitoring and five-year reviews will continue to ensure protectiveness of cleanup at the site. The year 2021 is the best estimate for complete implementation of cleanup technologies on the last portion of the base, which is the sediment in water surrounding the base. At that time, depending on results of that implementation, USEPA can determine the potential for delisting the site from the NPL.

4. Is it typical for residential housing to be erected on recent Superfund sites?

As part of cleanup plans, USEPA works with local community redevelopment plans to ensure that cleanup goals are compatible with the intended future use. Cleanup for residential use is the highest standard. If cleanup achieves a residential standard, then a site is considered suitable for residential or other use.

5. **Does the EPA have a statement regarding the [[HYPERLINK "http://investigations.nbcnews.com/_news/2012/08/28/13531823-navy-sought-to-stifle-concerns-of-radiation-on-sf-bay-island-emails-show"](http://investigations.nbcnews.com/_news/2012/08/28/13531823-navy-sought-to-stifle-concerns-of-radiation-on-sf-bay-island-emails-show)]? Eg. should the public be concerned over the Navy's ability to oversee cleanup?**

At Hunters Point, US EPA trusts its rigorous oversight and review process that has many layers of safeguards. The Navy's own internal routine quality control system functions as it is designed to do. When the Navy has found any concerns, it has reported them and corrected them. In addition, the Navy establishes new procedures when internal process needed improvement. This shows the system is working.

Q. How can we trust that the radiation cleanup is protective?

Cleanup decisions are only being made using the data that has been either reviewed or resampled. In addition, two independent methods of monitoring radiation are in place. The State Department of Public Health does its own independent analysis of the Navy's samples and it also takes confirmation samples and uses its independent laboratory to test radiation samples to confirm the protectiveness of the cleanup. We will review the resampled data from Tetra Tech as it comes in. We will not approve any cleanup as complete until it meets the established cleanup goals in the Record of Decision.

Q. The development plan for gentrification is bad for this community. The City and developer just want to make a lot of money and drive out the long term residents and businesses.

A. Many agencies are involved at the Hunters Point naval shipyard. The City, not EPA, is in charge of land use decisions. EPA's role is to make sure that any development at the former naval shipyard is done in a way that protects public health and the environment. The City's Office of Community Infrastructure and Investment hosts regular public meetings. Ethan Warsh at (415) 749-2577 can tell you when and where they are held so you can express your opinion.

Q. The City is holding meetings to propose to transfer property to the City for redevelopment. How can they do that when they might still be contaminated?

The Navy is preparing Parcels D-2, UC-1, and UC-2 for transfer. None of these parcels contain buildings for which the California Department of Public Health suspended its letters granting unrestricted release. These three parcels make up 12.6 acres out of the total 554 acres of the Hunters Point Naval Shipyard.

Q. How can you let the Navy leave contamination at the Shipyard, and then let the City build condos over that. People moving in will be exposed, and that's not safe!

The Navy is cleaning up the property to a level that is safe for its intended use. For future residential use, we require the highest standard. The Navy has removed or treated all the worst areas of contamination. In some areas, low levels of contamination are protected by a “durable cover,” which could mean asphalt, building foundation, or a 2 foot thick layer of dirt. In areas where we might see gases, the developer would be required to put in engineering controls that would protect people inside buildings. Finally, a risk management plans and restrictions on the deed would prohibit any future owners from tampering with these barriers. Environmental agencies will do inspections after construction to make sure these barriers stay in place.

Q. Residents of Bayview Hunters Point have complained repeatedly about illnesses that they believe was caused by the Navy’s operations over the decades. Are any of their claims valid?

While we can’t quantify exposures of residents over the past decades, the comprehensive risk assessments studied potential health effects through breathing, skin contact, drinking, and other pathways for exposure to contaminants of concern at the site now. Currently, the Shipyard is closed to the general public with exceptions for special events. The Hunters Point Shipyard Artists along with a few other tenants are allowed to occupy certain buildings at the Shipyard. These lease spaces were investigated for contaminants and were cleared for occupation.

However, during the construction of the selected remedies, the Navy implements several on-site controls and procedures at HPNS to ensure the public stays safe. In addition to the strategies listed below, individual oversight agencies monitor the cleanup and the California Department of Public Health collects its own confirmation samples from radiological cleanup sites for independent verification. The Navy conducts daily monitoring for air quality, both upwind and downwind to test for both particulates (such as dust) and radiological contamination. Misting systems are used to wet down work areas and roads, and stockpiles of soil are coated with a biodegradable polymer to minimize windblown dust. All truck beds containing soil (even clean soil) are required to be covered. A tire wash station also helps remove excess dirt and dust from truck tires as they leave the site. In addition, a Navy contractor provides daily street sweeping, and operations are shut down when conditions become too windy. Trucks entering and leaving the Shipyard must pass through a portal monitor which screens for radiation.

Q. In Parcel A, a monitor was not working for 4 months. We got exposed to asbestos. The BAAQMD gave only a pathetic \$500K fine. EPA didn’t do any enforcement at all. How can we trust you now?

A. We have learned from that experience and increased the level of oversight. The Bay Area Air Quality Management District (“Air District”) has an inspector assigned to the Hunters Point area that also checks every day that the monitors are working properly. If you have any more questions for the Air District, please call John Marvin, the head of enforcement, at 415-749-5190. If you see any immediate air pollution concerns, call the BAAQMD complaint line that takes calls 24 hours a day, 7 days a week: 24-hour toll-free hotline at 1-800-334-ODOR (6367).

Here is a link to more information about reporting complaints:

<http://www.baaqmd.gov/Divisions/Compliance-and-Enforcement/Air-Pollution-Complaints.aspx>

Q. I see dust coming from the Navy and from Lennar. What are you doing to stop this?

A. The Navy and the developer are both required to follow dust control measures. The Bay Area Air Quality Management District (“Air District”) already has an inspector who goes to the Hunters Point neighborhood every day to do unannounced inspections. In response to community concerns, EPA has recently begun doing unannounced inspections in addition to the routine inspections we have been doing with other agencies for years. We are now working together with the Bay Area Air Quality Management District (BAAQMD) inspectors to monitor dust and truck traffic across the board, not just radioactive waste. The Navy has recently improved its system to better control dust and to ensure trucks carrying any materials are covered. The Navy has increased internal checks, bought better sweeping equipment, improved coordination among contractors, and increased contract requirements to ensure dust control. If you have any more questions for the Air District, please call John Marvin, the head of enforcement, at 415-749-5190.

Q. Is contaminated sewage from the Navy coming out of manhole covers on 3rd Street?

Any sewage on 3rd street would include material that comes from locations beyond the Hunters Point Naval Shipyard. The Navy shut down active operations in 1974. Since then, the Navy has removed 28 miles of sanitary sewer and storm drain lines in support of the investigation of radiological contamination at the Shipyard. Only 2% of the piping required disposal as radioactive waste.

Q. Why is the Navy dumping contaminated waste 100 yards out in the Bay?

The Navy shut down its active operations in 1974 and discontinued dumping waste in the San Francisco Bay decades ago in the Metal Debris Reef in Parcel E (closed in 1948) and the Metal Slag Area in Parcel E-2. In 2008, the Navy completed removal and cleanup of 19,400 cubic yards of this material in these areas.

Q. Tetra Tech contractors also falsified radiation data. How can you trust anything they tell you?

EPA trusts our rigorous oversight and review process that has many layers of safeguards. The Navy’s own internal routine quality control system caught this issue right away before the information even came to any Agency. They found the errors/mistakes, reported them, and corrected them. This shows the system is working. Tetra Tech managers and staff have taken a number of actions to address the situation. They have reviewed 70,000 samples going back to 2005 to look for any signs of similar problems. Where they saw potential issues, they resampled. They have put in new procedures to prevent this problem from happening again. For example, they have retrained staff and increased scrutiny in the field.

Q. Will EPA punish Tetra Tech and the Navy?

Tetra Tech is the Navy's contractor. EPA's oversight role is with the Navy. As you can see from the public Tetra Tech investigation report, Tetra Tech has not renewed contracts for 3 employees involved in this matter. It also docked a month's pay from two supervisors. EPA's focus is on compliance and making sure that the cleanup is protective. Based on our discussions with the Navy and our review of the report Tetra Tech submitted to the Navy, the Navy and their contractor Tetra Tech are taking effective action to make sure this problem does not happen again. We are still evaluating the situation.

Q. Since we can't trust these contractors, have they let through radioactive dust contaminating our neighborhood?

The Shipyard has multiple layers of checks to make sure you are protected. For example, trucks go through a radiation screening portal before they can leave the Base. If the levels of radiation are high enough to trigger an alarm, then the truck must go back and secure any waste material to prevent exposure to the public. In addition, a staff person is stationed at that monitor to make sure that the driver covers the trucks and displays placards on four sides of it before the driver can get the paperwork it needs to take its load.

Q. Will EPA fire Tetra Tech? Why did Tetra Tech get this contract again? Isn't that rewarding bad behavior?

EPA has a federal oversight relationship with the Navy for this cleanup. Tetra Tech is a contractor for the Navy, and it is the Navy's responsibility to manage its contractors through its own contracting process. This includes an evaluation process. I suggest that you contact the Navy directly to address this internal procedure.

Q. Shouldn't you take away Tetra Tech's license?

The Nuclear Regulatory Commission (NRC) and the California Department of Public Health oversee the licensing of radiation cleanup service providers. They are aware of this issue and they are following the normal procedures for followup. For more information related to Tetra Tech's NRC license, contact Diane Screnci at 610-337-5330.

Q. What is the status of radiation from radiological testing at Hunters Point?

In 2004, a Historical Radiological Assessment identified 91 sites and areas that had possible radiological contamination at Hunters Point Naval Shipyard. Since that time, the Navy has been evaluating and cleaning up these sites. The Navy has removed 28 miles of sanitary sewer and storm drain lines in support of the investigation of radiological contamination at the Shipyard. Only 2% of the piping required disposal as radioactive waste. Approximately 300,000 cubic yards of soil around the piping have been excavated and tested. Only 5% of soil required disposal as radioactive waste.

Q. Has it all been cleaned up? Will all of it ever be cleaned up?

To date, investigations have been completed at 92% of the sites. The Navy will continue its work until all sites with possible radiological contamination will be investigated and any radiological contamination found is cleaned up.

Q. What about the affordable housing going in there? Is there any contamination left in that area?

Residential uses will only be permitted in areas when all the non-naturally occurring radiological material is removed from an area, which achieves “Unrestricted Free-Release” status. To achieve this, sites must be characterized by performing surveys and laboratory tests; regulatory oversight agencies must review the site results; and a letter must be submitted to document final approval. When a site receives Unrestricted Free-Release, the land is available for any future use without restrictions.

Q. I understand there will be some restrictions forever in the area as a result of radioactive contamination. Is that true? Where?

In some cases, low-level radiological contamination cannot be removed. The “contain in-place” site remedy has been selected at Installation Restoration (IR) Sites 01/21, IR-02, and IR-7/18 and includes a clean soil cover which will be managed long-term.

Q. What about the radioactive contamination that could not be removed and had to be covered up? Can you explain how and where that was done and what restrictions there are in that area?

To prevent contact with low-level radiological contamination, the Navy uses radiological controls, such as covering residual contamination with several feet of clean soil (containment) and/or land use controls, to prevent contact. These could include a demarcation layer underground that clearly separates the clean soil layer. These areas will obtain “Restricted Release,” which means that certain land uses (e.g., residential) and activities (e.g., digging below certain depths) will be restricted at the site to ensure the contain-in-place remedy remains protective.

Q. Will flooding from sea level rise move contamination into the Hunters Point neighborhood?

The Navy is building revetment walls along the shoreline that are designed to protect the cleanup from the sea level rise projections by the San Francisco Bay Conservation and Development Commission (BCDC). In addition, the Navy is building durable covers of asphalt or engineered soil caps with drainage systems to prevent contamination from moving along surfaces into the surrounding neighborhoods. Any new proposed development would also need to meet BCDC requirements regarding sea level rise.